

March 18, 2021

Nicole J. Wing  
Shareholder  
+1 312 609 7914  
[nwing@vedderprice.com](mailto:nwing@vedderprice.com)

**VIA ECF**

The Honorable Edgardo Ramos  
United States District Court  
40 Foley Square  
New York, NY 10007

**Re: *Bodum Holding AG et al., v Starbucks Corporation*  
Case No. 1:19-cv--4280-ERfil**

Dear Judge Ramos:

I write on behalf of Plaintiffs Bodum Holding AG, et al. (collectively, “Bodum”) in the above-referenced action.

Bodum is prepared to file its Written Response to Defendant Starbucks Corporation’s (“Starbucks”) March 10, 2021 Letter Motion on March 18, 2021. The Written Response will summarize and quote directly from the 2008 Settlement Agreement dated January 14, 2008 (“2008 Agreement”). Although Bodum has taken the position that the quoted portions and summaries of the 2008 Agreement do not violate any confidentiality provisions, Bodum seeks to cooperate with Starbucks’s requests that such filings be made in redacted form.

Based on the foregoing, Bodum respectfully requests that the Court grant Bodum’s request to file a redacted version of the Written Response and to file the unredacted version under seal.

Kind Regards,

/s/ Nicole J. Wing

Nicole Wing

NW/dm